

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, et al.,</div> <div>Debtor.¹</div>	<div>PROMESA</div> <div>Title III</div> <div>No. 17 BK 3283-LTS</div> <div>(Jointly Administered)</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Debtor.</div>	<div>PROMESA</div> <div>Title III</div> <div>Case No. 17 BK 4780-LTS</div>
<div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>Plaintiff,</div> <div>v.</div> <div>HON. PEDRO PIERLUISI, in his official capacity as Governor of Puerto Rico,</div> <div>Defendant.</div>	<div>Adv. Proc. No. 24-00062-LTS in 17 BK 4780-LTS</div>

MOTION FOR LEAVE TO FILE OMNIBUS REPLY

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

TO THE HONORABLE COURT:

COMES NOW, Solar United Neighbors (“SUN”) and Sierra Club’s Puerto Rico Chapter (“Sierra Club”), through its undersigned attorneys, and before this Honorable Court, very respectfully, states and prays:

1. On September 10, 2024, defendant Hon. Pedro R. Pierluisi filed *The Governor’s Limited Objection to Solar United Neighbors and Sierra Club Puerto Rico’s Intervention*. (ECF 25.)
2. On same date, Plaintiff Financial Oversight and Management Board for Puerto Rico filed Response of Financial Oversight and Management Board for Puerto Rico to the Motion request Intervention on Behalf of Solar United Neighbors and Sierra Club’s Puerto Rico Chapter. (ECF 26)
3. Both objections address related issues that overlap in certain substantive and procedural aspects, necessitating a consolidated omnibus reply for a comprehensive and coherent rebuttal.
4. Given the interrelation between the two objections and to avoid redundancy and promote procedural efficiency, the appearing party respectfully requests that this Honorable Court permit the filing of a single, unified omnibus reply addressing both objections from Governor and FOMB in one document.
5. Additionally, the debtor requests an extension of the 10-page limit for replies as established under the applicable procedures. In order to adequately address the issues raised in both objections, the debtor proposes that the page limit be extended to 15 pages.

6. The requested extension will allow for a thorough and detailed analysis of the objections, avoiding the need to submit multiple documents and facilitating a clearer and more efficient review of the matters in dispute.

WHEREFORE, SUN and Sierra Club respectfully request that this Honorable Court permit filing of unified reply addressing both objections in a single document and grant an extension of the page limit for the response from 10 pages to 15 pages.

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, this 13th day of September 2024.

WE HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. A courtesy copy of this Motion will be delivered to the Court by email to SwainDPRCorresp@nysd.uscourts.gov as provided in *Third Amended Standing Order*.



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